

**LAW OFFICES OF RAHUL WANCHOO**

Attorneys for Defendant  
Fuchuen Dihai Shipping Co. Ltd.  
Empire State Building  
350 Fifth Avenue, Suite 3304  
New York, New York 10118  
Phone: (201) 882-0303  
Fax: (201) 301-3576  
E-mail: rwanchoo@wanchoolaw.com

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TRANSFIELD ER CAPE LIMITED

Plaintiff,

- against -

FUCHUEN DIHAI SHIPPING CO. LTD., AND  
ZHEJIANG FUCHUEN CO. LTD.

Defendants.

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ECF CASE

07 cv 4528 (MGC)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(d), and upon the annexed Affidavit of Rahul Wanchoo, the exhibits annexed thereto, and the supporting Memorandum of Law, the Defendant **FUCHUEN DIHAI SHIPPING CO. LTD.**, will move as soon as counsel may be heard for an Order dismissing the Verified Complaint and vacating the Process Of Maritime Attachment And Garnishment.

Dated: New York, New York  
July 2, 2007

LAW OFFICES OF RAHUL WANCHOO  
Attorneys for Defendant  
FUCHUEN DIHAI SHIPPING CO. LTD.

By: Rahul Wanchoo  
Rahul Wanchoo (RW-8725)

cc. Lennon, Murphy & Lennon, LLC  
Attorneys for Plaintiff  
Transfield ER Cape Limited.  
420 Lexington Avenue  
Suite 300  
New York, NY 10170

Attn: Nancy R. Peterson, Esq.  
Patrick F. Lennon

Chalos, O'Connor & Duffy, LLP  
Attorneys for Defendant,  
Zhejiang Fuchuen Co. Ltd.  
366 Main Street  
Port Washington, New York 110050

Attn: Owen F. Duffy, Esq.  
George E. Murray